

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

<b>CAMERON BRACH,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 1:16-cv-978-TSE/JFA</b>
	)	
<b>CONFLICT KINETICS</b>	)	
<b>CORPORATION, <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	
	)	
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<b>CONFLICT KINETICS CORPORATION,</b>	)	
	)	
<b>Counterclaim Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>CAMERON BRACH and</b>	)	
	)	
<b>INDEPENDENT RECRUITING</b>	)	
<b>CONSULTANTS, LLC,</b>	)	
	)	
<b>Counterclaim Defendants.</b>	)	

**MOTION FOR SUMMARY JUDGMENT BY CONFLICT KINETICS  
CORPORATION, BRIAN STANLEY AND KATHLEEN HENDERSON**

Conflict Kinetics Corporation, Brian Stanley and Kathleen Henderson, by counsel, move pursuant to Fed. R. Civ. Proc. 56 for summary judgment as to all claims asserted in Cameron Brach’s Second Amended Complaint (ECF No. 11), and for partial summary judgment as to Count III of the Counterclaim of filed by Conflict Kinetics Corporation (ECF No. 32).

The grounds in support of this motion are set forth in the accompanying memorandum of law and exhibits.

CONFLICT KINETICS CORPORATION, *et al.*  
By Counsel

By: /s/ Russell J. Gaspar  
Russell J. Gaspar, Va. Bar No. 15020  
[rgaspar@cohenmohr.com](mailto:rgaspar@cohenmohr.com)  
Andrew K. Wible, Va. Bar No. 78168  
[awible@cohenmohr.com](mailto:awible@cohenmohr.com)  
Victor G. Klingelhofer, Va. Bar No. 22609  
[vklingelhofer@cohenmohr.com](mailto:vklingelhofer@cohenmohr.com)

COHEN MOHR LLP  
1055 Thomas Jefferson St., N.W., Suite 504  
Washington, D.C. 20007  
(202) 342-2550  
(202) 342-6147 (facsimile)

Attorneys for Conflict Kinetics Corporation,  
Brian Stanley and Kathleen Henderson

CERTIFICATE OF SERVICE

I hereby certify that on the 22d day of May, 2017, the foregoing Motion for Summary Judgment and Memorandum of Law, with exhibits, was electronically filed with the Clerk of the Court for the United States District Court for the Eastern District of Virginia and served on all parties of record through the CM/ECF system.

I further certify that a true copy of the foregoing Motion and supporting documents was also served by electronic mail on the following counsel of record for the plaintiff:

R. Scott Oswald  
[SOswald@employmentlawgroup.com](mailto:SOswald@employmentlawgroup.com)  
Nicholas Woodfield  
[nwoodfield@employmentlawgroup.com](mailto:nwoodfield@employmentlawgroup.com)  
Kellee Boulais Kruse  
[kkruise@employmentlawgroup.com](mailto:kkruise@employmentlawgroup.com)  
The Employment Law Group  
888 17<sup>th</sup> Street, N.W., Suite 900  
Washington, D.C. 20006

/s/ Russell J. Gaspar